



**Lippes
Mathias**
Wexler Friedman LLP

50 Fountain Plaza
Suite 1700
Buffalo, NY 14202
Phone: 716.853.5100
Fax: 716.853.5199
lippes.com

March 29, 2018

VIA ECF & FACSIMILE (212-805-7986)

The Honorable Paul G. Gardephe, U.S.D.J.
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Courtroom 705
New York, NY 10007

Re: Request for an Extension of Time to Respond to Complaint and
Adjournment of the Pre-Trial Conference
Alfredo Cruz Sanchez, et al. v. Rainbow Umbrella, et al.
Case No.: 17 Civ. 9065 (PGG)

Dear Justice Gardephe:

We recently were substituted in as counsel for Defendant Peter Schatzberg in the above-referenced action.

All counsel hereby respectfully request an extension of time to May 9, 2018 to respond to the Amended Complaint. This is the first time that undersigned counsel for Mr. Schatzberg has requested an extension of time. Counsel for Mr. Schatzberg are currently experiencing a heavy caseload, including an upcoming arbitration, and are in need of additional time to investigate the underlying allegations in order to properly respond to the Amended Complaint.

In the event the request for an extension of time to respond to the Amended Complaint is granted, we respectfully request an adjournment of the initial conference, currently scheduled for April 19, 2018, to a date after the herein requested deadline to respond to Plaintiffs' amended pleading. Additionally, as our office is located in



Buffalo, New York, we request that this Court allow us to appear for the initial conference via telephone. Similarly, as a result of this request to adjourn the initial conference, Defendants further request an extension of time to submit the joint letter and proposed case management plan.

All counsel have consented to this request. Please feel free contact us if you have any questions or instructions in this regard.

Respectfully submitted,

LIPPES MATHIAS WEXLER FRIEDMAN LLP

By: 

Vincent M. Miranda

VMM/mms

cc: Joseph D. Lockinger, Esq.
Colin James Mulholland, Esq.